

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

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Weihua Du,	:	2:23-cv-06780-DG-ST
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
Shalom Seglman; The Line DC Fund LLC; The Line	:	<b>NOTICE OF MOTION TO</b>
DC Manager LLC; The Line DC Escrow LLC;	:	<b>OPPOSE THE MOTION TO</b>
Yucaipa U.S. Hospitality Partners, LLC; YAAF II	:	<b>DISMISS THE AMENDED</b>
Parallel (U.S. Hospitality Partners), Inc.; Adams	:	<b>COMPLAINT</b>
Morgan Managing Member LLC; Adams Morgan	:	
Hotel Holdings LLC; Adams Morgan Hotel JV LLC;	:	
Adam Morgan Hotel Members LLC; Adams Morgan	:	
Hotel Owner LLC; Milou Chesapeake Regional	:	
Center LLC; Yevgeny Samokhleb; Liu & Bitterman	:	
PLLC,	:	
	:	
Defendants.	:	
	:	
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**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, the exhibits annexed thereto, and all the pleadings and proceedings herein, plaintiff Weihua Du (Ms. Du) will move this Court before United States District Judge Diane Gujarati, Courtroom 4B South, at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza East, Brooklyn, New York 11201, on October 2, 2024, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order: (a) pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b), deny the defendants Yevgeny Samokhleb and Liu & Bitterman PLLC's (collectively, the "Attorney Defendants") motion to dismiss; and (b) granting to Ms. Du such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order of the Judge Diane Gujarati dated July 2, 2024, the Attorney Defendants shall serve reply papers, if any, on or before October 1, 2024.

Dated: New York, New York

September 10, 2024

Anderson & Associates Law, P.C.

*Attorneys for Plaintiff Weihua Du*

/s/ Yen-Yi Anderson, Esq.

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